

**UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA**

NATIONAL ASSOCIATION FOR
GUN RIGHTS, INC.,

Plaintiff,

v.

JONATHAN MOTL, in his official
capacity as the Commissioner of
Political Practices for the State of
Montana; TIMOTHY C. FOX, in his
official capacity as Attorney General
for the State of Montana; LEO
GALLAGHER, in his official capacity
as County Attorney for the County of
Lewis & Clark,

Defendant.

) Case No: CV 16-00023-H-DLC

) **DECLARATION OF DAVID**
) **WARRINGTON**

I, David A. Warrington, declare as follows:

1. I am the Chairman of the National Association For Gun Rights, the
Plaintiff in this matter.

2. I have reviewed § 13-37-232(4), MCA, which exempts an
incidental committee from having to report the sources of its contributions if
it does not receive contributions for a specified candidate or ballot issue and
does not solicit contributions for incidental committee election activity,

including in-kind expenditures, independent expenditures, election communications, or electioneering communications.

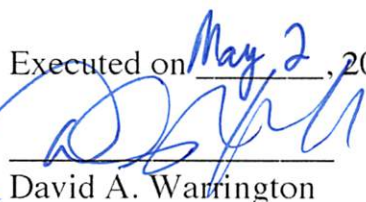
3. NAGR routinely includes in its solicitations to its contributors information concerning NAGR's efforts to hold elected officials accountable for their votes on issues relating to the Second Amendment.

4. Some of the activities for which NAGR solicits contributions include communications to residents that include the names of elected officials and are distributed with 90 days of an election, thereby qualifying as "electioneering communications" under Montana law.

5. It would be impossible for NAGR to separate contributions given to NAGR as a result of such solicitations from contributions that are given for other reasons.

6. As a result, NAGR would be forced to identify all of its contributors if it was required under Montana law to register as any kind of political committee, even an incidental committee.

I declare under penalty of perjury under the laws of the United States of America that the statements contained in this Declaration are true and correct.

Executed on May 2, 2016, in Des Moines, Iowa


David A. Warrington
Declarant